

# **EXHIBIT 21**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

NATIONAL ASSOCIATION FOR THE ADVANCEMENT  
OF COLORED PEOPLE, SPRING VALLEY BRANCH, et al.

Plaintiff,

v.

EAST RAMAPO CENTRAL SCHOOL DISTRICT, et al.

DEPOSITION OF PIERRE GERMAIN

New York, New York

Thursday, October 18, 2018

Reported by:

LEONORA L. WALKER

JOB NO. 149473

1 P. GERMAIN

2 reporter please swear in the witness.

3 P I E R R E G E R M A I N 10:50:53

4 The witness herein, having first been duly sworn by a

5 Notary Public for the State of New York was examined

6 and testified as follows: 10:50:53

7 EXAMINATION BY

8 MS. PARVIS:

9 Q Good morning, Mr. Germain. 10:51:00

10 A Good morning. How are you?

11 Q Good, thank you. How are you?

12 Before we get started I just wanted to 10:51:06

13 go over a few ground rules so we understand how this is

14 going to work today.

15 Have you ever been deposed or testified 10:51:13

16 under oath before?

17 A Not on that scale, but I have.

18 Q So you have been deposed before? 10:51:20

19 A Uh-huh.

20 Q Do you know how many times, or for when,  
21 or for what purposes? 10:51:26

22 A I think that's only once.

23 Q Only once?

24 A Yeah. 10:51:30

25 Q So you're aware that you just were sworn

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A About that, two or three.

Q Two or three? 11:22:21

A Uh-huh.

Q Okay. And do you remember when these  
board meetings took place? The month? 11:22:31

A 105 Madison.

MR. CRAVENS: Where or when?

MS. PARVIS: I said when, but that's 11:22:40  
okay. Where is perfectly fine.

BY MS. PARVIS:

Q Do you remember when these board 11:22:45  
meetings took place?

A When? Like the timing?

Q Like the month of 2013? 11:22:55

A I don't remember. I know it started at  
7:30 p.m.

Q Okay. 11:23:00

A But the day, like, when it's announced,  
that's the time I go, but I don't remember if it's the  
first week or the second week. No, that I don't 11:23:09  
remember.

Q Totally understandable.

A And when you attended those board 11:23:19  
meetings, what were the issues of greatest concern for

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2 you at the time?

3 MR. CRAVENS: Objection to the form. 11:23:29

4 THE WITNESS: The reason why that I  
5 attended at that time the meetings because I  
6 was not even -- I was -- there was a time I 11:23:43  
7 spent a lot of time in Haiti after the  
8 earthquake. So I tried to help the Haitian  
9 construction in Haiti. So when I came back and 11:23:55  
10 I met with a friend of mine, by the name of  
11 Mohammad, and he's a mechanic guy. He's from  
12 Pakistan. And he attended meetings before I 11:24:10  
13 have, and he was concerned because there was  
14 one Haitian lady at the time -- that's the way  
15 he put it -- was tried to videotaping the 11:24:24  
16 meeting. They have to call police on her, and  
17 he was concerned that we need to get together  
18 to see what we can do. And then he said he 11:24:34  
19 didn't like the way they were treating the lady  
20 at that time in the meeting.

21 When he said that and I said, well, one 11:24:48  
22 thing that I realize also with my folks because  
23 our problem, and I'm talking about culture, we  
24 most likely like to complain too much, but we 11:25:06  
25 refuse to participate. And by not

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2 participating so we don't know what's going on.

3 That's one of the reason why I become a fire 11:25:15  
4 fighter in my neighborhood at that time.

5 And I did say to him that, well, since  
6 I'm back now, I would try to get involved 11:25:30  
7 myself and volunteer my time to see what's  
8 going in the district. And we take it from  
9 there to see if I could make a difference in 11:25:40  
10 the quality of education of the kids in the  
11 area. And we spoke about that.

12 After that, I met with -- it was a 11:26:01  
13 meeting. I don't know what -- I met with  
14 Brendel Charles Logan.

15 THE COURT REPORTER: Brendel? 11:26:17

16 THE WITNESS: Brendel, B-R-E-N-D-E-L.

17 When we were talking and I said to her at that  
18 time that I would like to get involved in the 11:26:31  
19 school district to know what's going on in the  
20 district. And after I said to that to her, I  
21 received a phone call. I remember that day. I 11:26:46  
22 received a phone call, and the person, it was a  
23 Spanish person that called me at that time and  
24 I was speaking Spanish. And then she was 11:26:56  
25 impressed and listened to me speaking Spanish

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2 with that person.

3 She said, oh, you speak Spanish, too? 11:27:06

4 I said, yes, I do.

5 And she said, oh, my God. God is always  
6 good because I don't understand. My husband 11:27:12

7 involved in the district, and you just said you  
8 would like to get involved, and you speak  
9 Spanish which is a good thing. Can I introduce 11:27:22  
10 you to my husband?

11 I said, no problem. And that was the  
12 time she introduced me to Bernard Charles at 11:27:33  
13 that time. And he said me at that time that he  
14 was -- he was a part of the district already  
15 because he was not elected. He was -- what you 11:27:42  
16 call that? He was appointed at the district at  
17 that time, and there will be election taking  
18 place. And he asked me if I would join his 11:27:56  
19 team. And I said no problem because I would  
20 love to get involved.

21 He reached out to another lady, the 11:28:05  
22 Spanish lady. That's the way we get involved  
23 in the election, and we take it from there. I  
24 remember that. Yeah. That's why I get 11:28:16  
25 involved.

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2 allowed to.

3 Q So it's your position you cannot testify 12:39:18  
4 about anything that occurred during your executive  
5 session?

6 A I cannot. 12:39:36

7 Q So earlier when you decided to run, you  
8 initially spoke with Mrs. Charles who put you in touch  
9 with her husband; is that correct? 12:40:15

10 A That's correct.

11 Q And Mr. Charles asked you to join his  
12 team to run for a seat on the school board; is that 12:40:22  
13 correct?

14 A That's correct.

15 Q Can you describe what you mean by the 12:40:24  
16 word "team"?

17 A When you join someone, it's more than  
18 one, so to me it's like this your teammate. This is 12:40:33  
19 the person you're going to get together to do  
20 something, to fight for something. That's what I  
21 consider to be a team. 12:40:41

22 Q Okay. And you said earlier that another  
23 woman was part of that team. Is that woman Marylou  
24 Corado? 12:40:47

25 A Marylou Corado, that is correct.

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2 Q And how did you meet Ms. Corado?

3 A I think we were campaigning. I go 12:41:01

4 sometimes to her church, right there on South Central

5 Avenue at that time.

6 Q How did you communicate with Ms. Corado? 12:41:07

7 Did you e-mail?

8 A I think we talk on the phone, or I go

9 to her place usually at the church area. 12:41:28

10 Q Did you ever send text messages?

11 A I don't remember.

12 Q And what about Mr. Charles? For the 12:41:33

13 most part, how did you communicate with Mr. Charles?

14 A Verbally also.

15 Q Verbally? Verbally in person or 12:41:37

16 verbally on the phone?

17 A In person, or sometimes on the phone, or

18 sometimes I meet with you at your office or something 12:41:41

19 like that.

20 Q Did you ever e-mail back and forth with

21 Mr. Charles? 12:41:44

22 A No.

23 Q Okay. I'm just going to go back to your

24 declaration. I'll continue to read so you don't have 12:42:02

25 to hurt your eyes.

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campaign events?

A I don't know. 12:56:47

Q Did you have any fundraisers, campaign fundraisers?

A No. I don't remember, no. 12:56:54

Q Did you generally fund raise in 2013 as you were campaigning?

A No. 12:56:59

Q Did you raise any funds in 2013 as you were campaigning?

A No. 12:57:34

MS. PARVIS: You want a break?

THE WITNESS: Yeah.

MS. PARVIS: Okay. 12:57:34

THE VIDEOGRAPHER: Time is 12:58 p.m.

and we're going off the record.

(Whereupon a break was taken.) 12:57:40

THE VIDEOGRAPHER: This is the start of media label number 3. The time now is 1:36 p.m. and we're back on the record. 13:36:14

BY MS. PARVIS:

Q Mr. Germain, before we broke for the lunch break, we were discussing some of the things that he did to campaign. So I just want to go back to your 13:36:25

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2 declaration, which has been marked as Exhibit 1.

3 On page 3 of that declaration, paragraph 13:36:36  
4 11, I'm happy to read for you. It says, as part of our  
5 campaign, we met with members of Orthodox and Hasidic  
6 community. Mr. Charles already knew several members of 13:36:47  
7 that community. He introduced Ms. Corado and me to  
8 rabbis in the Orthodox and Hasidic community.

9 In that first sentence when you say "we 13:36:56  
10 met with members of the Orthodox and Hasidic  
11 community," is we the members of your team earlier Mr.  
12 Charles and Ms. Corado? 13:37:05

13 A That's correct.

14 Q Do you know which members of the  
15 Orthodox and Hasidic community you met with? 13:37:09

16 A I met with a couple rabbis, but I don't  
17 know their name.

18 Q You don't know their name. 13:37:23

19 Do you know when --

20 A I was told their name, but I don't  
21 remember their name to be honest with you. 13:37:24

22 Q And do you know when you met with these  
23 rabbis?

24 A I cannot be specific about it, but I 13:37:35  
25 remember before we -- at the time we were campaigning

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2 though, and he said, well, you now, I'm going to  
3 introduce to some rabbis, and then we went to their 13:37:50  
4 offices, and we sit down and we talk. As I was  
5 introduced to them, I remember I said to them that you  
6 are from Israel, you went through Holocaust. I'm 13:38:13  
7 pretty sure now you're here in New York, you're not  
8 going back to Israel. I'm Haitian, we went through  
9 slavery. And I'm here in now New York. I'm pretty 13:38:27  
10 sure I'm not going back to Haiti or ever. We're here  
11 to live together. So why don't we do -- get ourselves  
12 together, we seek one objective, the kids. Let's see 13:38:43  
13 what we can do for them. That was my approach.

14 Q So you said this was before you were  
15 campaigning? 13:38:50

16 A At the time I believe I was campaigning.  
17 I don't remember exact time.

18 Q Okay. You don't remember. 13:38:57  
19 What if we put it in relation to the  
20 phone call that you had with Mr. Charles -- well, the  
21 phone call you had with Mrs. Charles. 13:39:05

22 How soon after you decided to run with  
23 Mr. Charles and as part of Mr. Charles' team did you  
24 meet with these rabbis? 13:39:13

25 A Coincidentally it was not that far I

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15:56:36

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WITNESS      EXAMINATION BY      PAGE

P. Germain                      Ms. Parvis                      6                      15:56:36

-----E X H I B I T S-----

PLAINTIFF'S                                      PAGE                      15:56:36

Exhibit 1      Declaration of Pierre Germain      44

Exhibit 2      Expenditure and Contribution

Statement                                      115                      15:56:36

Exhibit 3      East Ramapo Article                      130

Exhibit 4      E-mail                                      157

Exhibit 5      Notice of Subpoena                      163                      15:56:36

Exhibit 6      The Blame Game Article      168

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